



J. F. Horner  
Vice President - Refining & Engineering

June 12, 1984

Certified Mail 2048542  
Return Receipt Requested

RCRA Activities  
Part B Permit Application  
Region V, U.S. Environmental Protection Agency  
Post Office Box A3587  
Chicago, Illinois 60690-3587

Gentlemen:

Amoco Oil Company Wood River Refinery, ILD 980700967 G, TRS, TSD, PA

Please refer to your May 18, 1984 letter responding to our March 13, 1984 request that Region V reconsider calling for a Part B permit application for Amoco's Wood River facility (ILD 980700967) at this time. You requested that a more detailed explanation as to why the application request should be withdrawn be provided and that our request be signed by a responsible corporate officer. We are once again requesting that you reconsider our request for withdrawal of the Part B application for reasons that will be described.

The principal reason why we believe your request for a Part B permit application should be withdrawn is that a final decision has been made not to resume refining operations at Wood River and Amoco Oil Company plans partial closure of the site. By this we mean closure of the hazardous waste management facilities under RCRA; no plans have been made yet for dismantling processing equipment. Our consultant has completed the site closure plan which will be submitted to the Illinois Environmental Protection Agency pursuant to 35 Ill. Adm. Code, Part 725, Subpart G. This submission will be made by July 15, 1984. USEPA will be notified by copy of the submission.

Another reason why we believe the Part B permit application request should be withdrawn is the inconsequential nature of the remaining calcium oxide bag soaking operation. In fact, it is reasonable to conclude that this activity is a part of the process rather than hazardous waste treatment for the following reasons.

While neither calcium oxide nor paper is listed as a hazardous substance, the empty calcium oxide bags may fit the definition of ignitable and reactive because if they are moistened with less than an adequate amount of water, the heat of reaction between the remaining traces of calcium oxide and water has on occasion been sufficient to cause the bags to ignite. However, if the bag is soaked with a large amount of water, the water absorbs the heat of reaction and prevents a temperature rise sufficient to ignite the paper. Once the bag has been water soaked, there is no further potential for ignition.

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**Amoco Oil Company**

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STATE OF ILLINOIS

As discussed in our March 13, 1984, letter, we were not sure that the bag-soaking operation could be exempted from regulation on the basis of being a totally enclosed treatment system. However, we now believe that treatment of the empty calcium oxide bags is actually a part of the manufacturing process and that the waste material from the process is the water-soaked bags. It is in the interest of plant safety that the bags are soaked with water.

Following is a description of the way in which calcium oxide is used at Wood River. Calcium oxide is used as a reactant in a manufacturing process and is received in paper bags. At the point in the process that calcium oxide is required, an operator will transport the required number of bags to a stirred reaction vessel. The calcium oxide is added, a bag at a time, to the reaction mass through a top hatch. When the addition is complete, the operator collects the empty bags and places them in a metal, open-top container where they are soaked with water. The water soaked bags are subsequently disposed of as a nonhazardous waste.

Based on the foregoing, we request your approval to withdraw the calcium oxide bag soaking operation from Part A of our permit application.

We would also like to take this opportunity to clarify the present status of the plant site: (1) Amoco Petroleum Additives Company is conducting a lube and petroleum additive manufacturing operation on the site and is maintaining surveillance and security of hazardous waste management facilities; (2) Amoco Oil's Marketing department is conducting a truck and marine terminaling operation; and (3) Amoco Oil's Refining department is making preparations for closing hazardous waste management facilities on the site.

In summary, in view of our plans for closure of hazardous waste management facilities on Amoco's main plant site in Wood River (ILD 980700967), we respectfully request that you withdraw your request for a Part B permit application at this time. We shall then withdraw our Part A permit application upon completion of closure.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Yours truly,



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JUL 05 1984

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